

**IN THE UNITED STATES BANKRUPTCY COURT**  
**FOR THE NORTHERN DISTRICT OF ILLINOIS**  
**EASTERN DIVISION**

**In the Matter of:**

Jermaine A. Blyden

**Debtor(s)**

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}  
}

Case No. 18-35397

Chapter 13

Judge Barnes

**NOTICE OF MOTION**

TO:

Marilyn O Marshall, Chapter 13 Trustee, 224 South Michigan, Ste 800, Chicago, IL 60604, via electronic court notification;

Roundpoint Mortgage, 5032 Parkway Plaza Blvd, Charlotte, NC 28217, via U.S. Mail;

4908-4910 S Vincennes Condominium Association, c/o Cervantes, Chatt, & Prince PC, 16w343 83rd St Ste A, Burr Ridge, IL 60527 via U.S. Mail;

Ronald J. Kapustka, Attorney for 4908-4910 S Vincennes Condominium Association, Kovitz Shifrin Nesbit, 175 N. Archer Ave., Mundelein, IL 60060, via U.S. Mail;

Insync Property Management, PO Box 5032, Chicago, IL 60680, via U.S. Mail;

Capital One Auto Finance, PO Box 30285, Salt Lake City, UT 84130, via U.S. Mail;

First Bank of Puerto Rico, PO Box 9146, San Juan, PR 00908, U.S. Mail;

Jermaine A. Blyden, 4910 S. Vincennes Ave., Unit 2, Chicago, IL 60615; via U.S. mail;

SEE ATTACHED ADDRESSES

PLEASE TAKE NOTICE that on February 3, 2022, at 1:30 p.m., I will appear before the Honorable Timothy A. Barnes, or any judge sitting in that judge's place, and present the motion of Debtor to Modify Plan, a copy of which is attached.

**This motion will be presented and heard electronically using Zoom for Government.** No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

**To appear by video**, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password. To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828- 7666. Then enter the meeting ID and password.

**Meeting ID and password.** The meeting ID for this hearing is 161 329 5276 and the password is 433658. The meeting ID and password can also be found on the judge's page on the court's web site.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

### **PROOF OF SERVICE**

I, the undersigned, certify that I caused this Notice and a copy of the attached document(s) to be served upon the entities named above by depositing the same in the U.S. Postal Service's mail box at 8707 Skokie Blvd Suite 305, Skokie, IL 60077 on January 10, 2022, except that the Trustee and any other party indicated in the Notice of Filing were served electronically by the court on such date.

/s/ David Freydin  
David Freydin, Esq  
Law Offices of David Freydin  
8707 Skokie Blvd, Suite 312  
Skokie, IL 60077  
Phone: 847.972.6157

Label Matrix for local noticing  
0752-1

Case 17-07279  
Northern District of Illinois  
Eastern Division  
Mon Dec 24 09:07:39 CST 2018

Capital One Auto Finance c/o AIS Portfolio S  
4515 N Santa Fe Ave. Dept. APS  
Oklahoma City, OK 73118-7901

4908-4910 S Vincennes Condominium Associatio  
C/O Cervantes Chatt & Prince PC  
16W343 83rd St Ste A  
Burr Ridge, IL 60527-7950

Capital One Auto Finance, a division of Capi  
P.O. BOX 165028  
IRVING, TX 75016-5028

Capital One Auto Finance c/o AIS Portfolio S  
P.O. BOX 4360  
Houston, TX 77210-4360

U.S. Bankruptcy Court  
Eastern Division  
219 S Dearborn  
7th Floor  
Chicago, IL 60604-1702

4908-4910 S. Vincennes Condominium Associati  
c/o Cervantes Chatt & Prince P.C.  
16W343 83rd Street, Suite A  
Burr Ridge, IL 60527-7950

Cach, LLC  
PO Box 5980  
Littleton, CO 80127

(p)CAINE & WEINER COMPANY  
12005 FORD ROAD 300  
DALLAS TX 75234-7262

Capital One  
Attn: General Correspondence/Bankruptcy  
Po Box 30285  
Salt Lake City, UT 84130-0285

Capital One Auto Finance  
Attn: General Correspondence/Bankruptcy  
Po Box 30285  
Salt Lake City, UT 84130-0285

Capital One Auto Finance  
a division of Capital One, N.A.  
P.O. Box 165028  
Irving TX 75016-5028

Capital One Auto Finance c/o AIS  
Portfolio Services, LP f/k/a AIS Data  
Services d/b/a/ Ascension Capital Group  
4515 N Santa Fe Ave. Dept. APS  
Oklahoma City, OK 73118-7901

Capital One Bank (USA), N.A.  
PO Box 71083  
Charlotte, NC 28272-1083

Chase Cardmember Services  
PO Box 15678  
Wilmington, DE 19885-5678

Cimarron Mtg  
Po Box 1325  
Ruston, LA 71273-1325

City of Chicago  
Department of Finance  
PO Box 88292  
Chicago, IL 60680-1292

City of Chicago Department of Finance  
c/o Arnold Scott Harris P.C.  
111 W. Jackson Blvd Ste. 600  
Chicago, IL 60604-3517

Convergent Outsourcing  
PO Box 9004  
Renton, WA 98057-9004

Fed Loan Sevicng  
Po Box 69184  
Harrisburg, PA 17106-9184

First Bank of Puerto Rico  
PO Box 9146  
San Juan, PR 00908-0146

First Premier Bank  
601 S Minneapolis Ave  
Sioux Falls, SD 57104

Fst Premier  
601 S Minneapolis Ave  
Sioux Falls, SD 57104

Internal Revenue Service  
PO BOX 7346  
Philadelphia, PA 19101-7346

Lou Harris Company  
1040 S Milwaukee Ave Ste  
Wheeling, IL 60090-6375

Navient  
Attn: Bankruptcy  
Po Box 9500  
Wilkes-Barr, PA 18773-9500

Navient Solutions, LLC on behalf of USA Fund  
Attn: Bankruptcy Litigation Unit E3149  
PO Box 9430  
Wilkes Barre, PA 18773-9430

Onemain Financial/Citifinancial  
6801 Colwell Blvd  
Ntsb-2320  
Irving, TX 75039-3198

Pentagon FCU  
Po Box 1432  
Alexandria, VA 22313-1432

Pentagon Federal Cr Un  
Attention: Bankruptcy Department  
2930 Eisenhower Ave  
Alexandra, VA 22314-4557

(p)PORTFOLIO RECOVERY ASSOCIATES LLC

PO BOX 41067

NORFOLK VA 23541-1067

Provident/1st Advantag

701 E 22nd St Ste 125

Lombard, IL 60148-5096

Document

Page 4 of 6

Quantum3 Group LLC as agent for

Velocity Investments LLC

PO Box 788

Kirkland, WA 98083-0788

RoundPoint Mortgage Servicing Corporation  
5016 Parkway Plaza Blvd Suite 200  
Charlotte, NC 28217-1930

RoundPoint Mortgage Servicing Corporation  
c/o The Wirbicki Law Group, LLC  
33 W. Monroe St., Ste.1140  
Chicago, IL 60603-5332

Roundpoint Mtg  
5032 Parkway Plaza Blvd  
Charlotte, NC 28217-1918

SunTrust  
PO BOX 79041  
Baltimore, MD 21279-0041

US Dept of Education  
Attn: Bankruptcy  
Po Box 16448  
Saint Paul, MN 55116-0448

Us Dept Ed  
Ecmc/Bankruptcy  
Po Box 16408  
St Paul, MN 55116-0408

Usa Funds/sallie Mae Servicing  
Cbe Group  
Po Box 900  
Waterloo, IA 50704-0900

David Freydin  
Law Offices of David Freydin Ltd  
579 W. North Ave  
Suite 203  
Elmhurst, IL 60126-2144

Jermaine A Blyden  
4910 S. Vincennes Ave, Unit 2  
Chicago, IL 60615-2418

Marilyn O Marshall  
224 South Michigan Ste 800  
Chicago, IL 60604-2503

Patrick S Layng  
Office of the U.S. Trustee, Region 11  
219 S Dearborn St  
Room 873  
Chicago, IL 60604-2027

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified  
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Caine & Weiner  
Attn: Bankruptcy  
21210 Erwin St  
Woodland Hills, CA 91367

Portfolio Recovery Associates, LLC  
Successor to CAPITAL ONE BANK(USA),N.A.  
(ORCHARD BANK)  
POB 41067  
Norfolk, VA 23541

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)RoundPoint Mortgage Servicing Corporation

End of Label Matrix  
Mailable recipients 43  
Bypassed recipients 1  
Total 44

**IN THE UNITED STATES BANKRUPTCY COURT**  
**FOR THE NORTHERN DISTRICT OF ILLINOIS**  
**EASTERN DIVISION**

**In the Matter of:**

Jermaine A. Blyden

**Debtor(s)**

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Case No. 18-35397

Chapter 13

Judge Barnes

**DEBTOR'S MOTION TO MODIFY PLAN**

NOW COMES THE DEBTOR by and through his attorney, David Freydin, and requests that this Honorable Court modify the Chapter 13 Plan under Section 1329 for the reasons below, and in support thereof, state as follows:

1. That the Debtor filed a Chapter 13 bankruptcy petition in the Northern District of Illinois, Eastern Division as case number 18-35397 on December 22, 2018.
2. That this Honorable Court confirmed the Debtor's Chapter 13 Plan on March 7, 2019, with secured creditors to be paid 100.00% and general unsecured creditors to be paid 100.00%.
3. That the Debtor has not converted the instant Chapter 13 case to a Chapter 7 case.
4. That the Debtor's confirmed plan requires him to pay \$1,600.00 per month for 60 months.
5. That on October 18, 2019, this Honorable Court entered an order increasing Debtor's Chapter 13 payments to \$2,000.00 per month (effective September 2019) for the remainder of the case.
6. That on March 19, 2020, this Honorable Court entered an order increasing the Debtor's Chapter 13 payments to \$2,200.00 per month (effective March 2020) for the remainder of the case.
7. That the Debtor lost his job in August 2021 and was out of work until November 2021.

8. That as a result of the loss of income and despite his best efforts, Debtor fell behind on his Chapter 13 Plan payments and has been unable to cure the default.
9. That the Debtor has recently found two new jobs and can afford to resume making payments via Order to Employer to Pay the Trustee.
10. That the Debtor asks this Honorable Court to defer the current default so that he may successfully complete his Chapter 13 case, continuing to pay 100% to all creditors.
11. That by deferring the current default, the creditors that have filed claims in this case will receive more than they would if the case were dismissed, or if the Debtor was forced to convert case to one arising under Chapter 7 of the Bankruptcy Code.
12. That the Debtor filed the instant case in good faith and intends to complete the Plan of Reorganization.

WHEREFORE THE MOVANT PRAYS that this Honorable Court enter an order modifying the Chapter 13 plan to:

- A. That this Honorable Court enter an order modifying the Debtor's Chapter 13 Plan in order to defer the default through January 2022.
- B. For such other and further relief this Court deems just and proper.

Respectfully submitted,

/s/ David Freydin  
David Freydin  
Law Offices of David Freydin, PC  
8707 Skokie Blvd., Suite 312  
Skokie, IL 60077  
Phone: 847.972.6157